

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846
Honorable Thomas J. Tucker
Chapter 9

DPLSA's SUPPLEMENTAL CITATIONS TO FILED EXHIBITS D (BLUE CROSS PLAN) [DOCKET NO. 9974] & E (HAP PLAN) [DOCKET NO. 9976] SUBMITTED IN ACCORDANCE WITH THIS COURT'S MAY 29, 2015 ORDER REGARDING FURTHER PROCEEDINGS ON THE CITY OF DETROIT'S MOTION FOR CERTAIN RELIEF AGAINST THE DPLSA [DOCKET NO. 9901] IN SUPPORT OF DPLSA'S RESPONSE IN OPPOSITION TO THE MOTION

The Detroit Police Lieutenants and Sergeants Association ("DPLSA"), by its counsel, Erman, Teicher, Zucker & Freedman, P.C., in accordance with this Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Motions for Certain Relief Against the DPLSA [Docket No. 9901], cite the following specific provisions of the Certificates of Coverage for the City's Medical Plans, **Exhibit D**, Blue Cross Plan [Docket No. 9974] and **Exhibit E**, HAP Plan [Docket No. 9976] in support of its opposition to the City of Detroit's Motion for (I) Determination that the Detroit Police Lieutenants and Sergeants Association has Violated the Terms of the City of Detroit's Confirmed Plan of Adjustment and the Order Confirming It; and (II) Order (A) Enjoining Further Violations and (B) Requiring Dismissal of State Actions [Docket No. 9656]:

CITATIONS TO CITY HEALTH PLANS

A. EXHIBIT D – BLUE CROSS PLAN

1. Correspondence to Subscriber, p. 2 [**Docket No. 9974, p. 3**].
2. Section 1, pp. 2-3, Eligibility: Who is Eligible to Receive Benefits Section 6, p. 25, General Conditions: Changes in Your Family, Changes to Your Certificate [**Docket No. 9974, pp. 9-10**].
3. Section 6, p. 126, General Conditions: Entire Contract; Changes [**Docket No. 9974-10, p. 6**].
4. Section 7, p. 143, Definitions: Group [**Docket No. 9974-11, p. 11**].
5. Section 7, p. 149, Definitions: Member [**Docket No. 9974-12, p. 4**].
6. Section 7, p. 154, Definitions: Qualified Beneficiary [**Docket No. 9974-12, p. 9**].
7. Section 7, p. 158, Definitions: Spouse [**Docket No. 9974-12, p. 13**].
8. Section 7, p. 161, Definitions: Working Aged [**Docket No. 9974-12, p. 16**].

B. EXHIBIT E – HAP PLAN

1. Section 1, p. 1, Introduction: Section 1.1, Your Coverage; Section 1.3, This Contract; Section 1.4, Definitions [**Docket No. 9976-2, p. 6**].
2. Section 2, p. 2, Eligibility: Section 2.1, Subscriber; Section 2.2, Dependents [**Docket No. 9976-2, p. 7**].
3. Section 6, p. 27, Member Rights and Responsibilities: Section 6.2.a. [**Docket No. 9976-3, p. 16**].
4. Section 8, p. 32, Cancellation: Section 8.5, Automatic Cancellation [**Docket No. 9976-4, p. 2**].

5. Section 10, pp. 34, 35, General Provisions: Section 10.5, This Contract and Interpretation; Section 10.9, Amendments; Section 10.11, Entire Agreement **[Docket No. 9976-4, pp. 4, 5].**
6. Section 11, Definitions, pp. 38, 39, 40, 41, 43, Section 11.10, Contract; Section 11.17, Dependent; Section 11.19, Eligibility; Section 11.34, Member; Section 11.48, Subscriber **[Docket No. 9976-4, pp. 8, 9, 10, 11, 13].**

Respectfully submitted,

ERMAN, TEICHER, ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek
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DATED: June 17, 2015

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CERTIFICATE OF SERVICE

The undersigned certifies that on June 17, 2015, the DPLSA's SUPPLEMENTAL CITATIONS TO FILED EXHIBIT D (BLUE CROSS PLAN) [DOCKET NO. 9974] & EXHIBIT E (HAP PLAN) [DOCKET NO. 9976] SUBMITTED IN ACCORDANCE WITH THIS COURT'S MAY 29, 2015 ORDER REGARDING FURTHER PROCEEDINGS ON THE CITY OF DETROIT'S MOTION FOR CERTAIN RELIEF AGAINST THE DPLSA [DOCKET NO. 9901] IN SUPPORT OF DPLSA'S RESPONSE IN OPPOSITION TO THE MOTION and CERTIFICATE OF SERVICE were electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

ERMAN, TEICHER, ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek

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DATED: June 17, 2015